

Integrated Regional Water Management Grant Program  
Scoping Meetings – Stakeholder Input

## Performance Based vs. Competitive Program

### Definition –

Performance Based means a grant program that is focused on the content and quality of a grant application. DWR would work with applicants on a scope of work to develop or improve an IRWM plan. When the scope meets a pre-established standard an applicant could pursue a planning grant. Similarly, when an applicant's IRWM plan meets pre-established requirements, the applicant could pursue implementation funding. The program would not be deadline driven.

Competitive means a grant program similar to what has been run in previous rounds, where all applications are due on a specific date; application contents are evaluated against an established set of scoring criteria; applications are ranked; and funding decisions are based on application ranking and available funding.

### Observations from Previous Efforts –

- Applicants generally could have benefited from more state involvement in the development of IRWM Plans.
- Applicants could have benefited from a more interactive/iterative grant program versus submitting everything in an application package and being critiqued only on the single submission.
- Not all applicants are at the same stage in plan development making it difficult for some to compete.
- Deadlines, rather than long-term goals have driven past planning efforts

### DWR Concept for IRWM Grant Program –

DWR is considering modifying the program to be more performance based. DWR would have more contact with applicants to monitor and assist performance, and deadlines would not drive the process.

### Input Questions –

From your regions perspective, what are the advantages/disadvantages of a Competitive Grant Program?

*Advantages – best projects get funding and there is one deadline that everyone works toward to ensure that money isn't awarded to those first to the trough over those who take their time and create a good plan and implementation grant application.*

*Disadvantage – often those that are most in need of funding can't compete – small systems, disadvantaged & EJ communities, community based watershed groups because they do not have the resources to meet readiness to proceed criteria and to hire consultants to provide the range of information and formatting that make a project competitive.*

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**Performance Based or Competitive Program Input**

From your regions perspective, what are the advantages/disadvantages of a Performance Based Grant Program?

*Advantages – If standards are clearly defined, it offers a clear roadmap for funding, allowing regional entities greater certainty in planning their capital program*

*Disadvantages – Standards must be clear and uncompromising; a substandard plan cannot be funded simply because it is the only one in the region. In addition, it creates the probability that those who have the most resources will meet the criteria first and funding could be exhausted before those with fewer resources are able to meet the criteria.*

Which type of program would your region prefer and why?

Across regions, a combined program would be preferable. There should be basic minimum performance standards that all IRWMPs and implementation grants must meet to apply in the first place. But, to ensure that everyone has an equal opportunity to access funds, the actual awards should be competitive. The competitive process will also provide incentive to regions to reach higher than the basic standards expected of all plans.

Are there other ideas or suggestions you have concerning performance based versus a competitive grant program?

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## IRWM Plan Standards

### Observations from Previous Efforts –

Minimum standards for IRWM plans included in the guidelines may not be sufficient to ensure high quality.  
Governance of an IRWM plan was not always easily addressed.  
Project development and selection was not always tied to measurable plan objectives.  
Stakeholder involvement was inadequate in some plans.

### Other Observations –

Proposition 84 contains language that will necessitate changes in the guidelines and standards. Eleven funding areas will limit competition as a means to ensure quality if plans.

### DWR Concept for IRWM Grant Program –

- DWR is considering emphasis on planning prior to funding implementation projects.
- DWR is considering holding IRWM Plans to pre-established standards.
- Standards would be added or modified (such as project prioritization and governance) in the guidelines.
- Applicants would not be eligible to pursue implementation grants until the IRWM Plan meets a pre-established standards.
- Planning grants would be predicated on a scope of work that produces an IRWM plan that will meet the pre-established standards.

### Input Questions –

Based on your experience with the current standards which ones were difficult to address? Please discuss what made them difficult.

*The most difficult standards to address were*

- *Addressing environmental justice needs*
- *Soliciting stakeholder participation*
- *Involving local land use agencies*
- *Setting measurable goals and objectives*
- *Prioritizing projects for funding applications*

*Both EJ needs and Stakeholder involvement were extremely limited in this process across regions. First, stakeholders were not advised of the project until the first workshop was held in April of 2006, well after the consultants were hired, layout of the plan determined and research and assessment had begun. As a result, consultants were hired to conduct outreach who had no experience in community organizing or stakeholder engagement; the planning process was determined, with their advice and the input only of the water agencies involved and all of the funds were accounted for leaving few resources to support actual stakeholder involvement.*

*For example, by the time the Environmental Justice Coalition for Water was engaged by the*

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*Coastal Conservancy to help define the EJ component of the plan, a draft had already been prepared, the background documents were complete, and the project rankings had been performed. While our input was welcomed, and much of our language incorporated, the lack of **any** stakeholder advice at the outset of the planning process lessened the effectiveness of our work and resulted in a much poorer product. And we have yet to see whether our advice on how to measure EJ benefits will be incorporated into the project prioritization process, as no changes have yet been made.*

*The lack of measurable objectives is largely due to the fact that the process was overseen by a technical advisory committee rather than a policy advisory committee. While the former is certainly important, its members were almost exclusively mid-level planning and engineering staff from the agencies. In order to set goals, for example, an agreement that new source water projects would contribute to reduced demand on water imports, or a regional commitment not to increase water imports over the next 20 years, those with the power to make policy need to be at the table making the decisions. Some combination of elected officials, water board directors, and NGO and EJ representatives would, in my opinion be an appropriate mix for such a body.*

*The inability to prioritize projects is directly attributable to the lack of quantifiable goals.*

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**IRWM Plan Input**

Which standards, if any, were not helpful in your IRWM Plan?

What elements would be helpful for DWR to include or explain in a governance standard?

*The basic governance standard should include NGO and EJ representation on the decision-making body. Without direct influence over decisions non-water agency input is not likely to be weighted favorably. In addition, key considerations regarding the environment and EJ issues may be overlooked.*

*There should be no financial contribution requirement for NGO, EJ, or small water system representation on the governance structure. Participation requires a huge outlay of resources and adding an additional monetary contribution requirement will necessarily exclude most NGOs, all EJ groups, and all small water systems.*

*Conversely, either DWR or lead agencies should be required to provide financial assistance to NGO and EJ representatives to defray the high cost of full participation.*

*Stakeholder and EJ involvement. DWR should require a stakeholder outreach and engagement plan as part of every IRWM application, plan, and implementation grant.*

- This plan should, at a minimum, outline the following steps in stakeholder/DAC/EJ engagement*
- Identification of potential stakeholders, based upon initial notification of stakeholder organizations at the time an IRWM is proposed, using readily available mailing and contact lists.*
- Identification of level of interest and involvement of organizations, and plans for maintaining that involvement. Plans should clearly outline 3 levels of involvement, and explain how they plan to undertake each degree of involvement*
  - 1. Informative – notices, workshops, mailings, web-based information*
  - 2. Interactive – regular communications with specific requests for information and opinion*
  - 3. Collaborative – Full engagement in planning, implementation and governance*
- Funding needed to*

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What elements would NOT be helpful for DWR to include in a governance standard (what would make a governance standard too restrictive)?

Allowing agencies to require a monetary contribution to gain a seat at the governance table.

In what areas was it important for your plan to exceed the minimum standards?

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## Disadvantaged Communities

### Comment Summary from Previous Efforts –

Incentives to reduce cost share for DAC did not address hardships DACs face engaging the IRWM process.

### DWR Concept for IRWM Grant Program –

Through Prop 84 DWR does have the means to provide some technical assistance and financial assistance to help DAC engage in their regional IRWM processes. DWR is considering implementing this assistance early in the process so DAC's can engage more fully in IRWM planning and/or application preparation processes. DWR is also considering allocating funding to projects that meet critical needs of DACs.

### Input Questions –

What types of technical assistance would be helpful to augment your region's efforts to engage DACs in the IRWM process?

*(Also, please see attached minimum criteria for EJ/DAC technical assistance.)*

*Technical assistance must begin with instructions to the agencies developing the plan. Many simply don't understand the challenges of these communities, and feel that issuing an invitation is the extent of their responsibility. Or, alternatively, technical assistance could be contracted out directly to NGOs in each region to ensure the fullest and most meaningful participation.*

**Comment [D1]:** I'm not convinced that many agencies have the capacity or interest in understanding. So, I'm not sure it's a good use of resources to provide them with technical assistance. In addition, DWR could view this as support of their assertion that technical assistance should be open to a broader array than just disadvantaged communities.

**Comment [D2]:** This is great!

*There are also different classes of disadvantaged communities*

- 1. Disadvantaged residents dispersed within a larger community, or making up a small area of a larger community*
- 2. Communities served by a water, flood, or wastewater agency that, in total, qualify as disadvantaged (80% of state MHI) or extremely disadvantaged (60% MHI)*
- 3. The agencies that serve these communities, and lack both the rate flexibility and the technical, managerial and financial (TMF) capacity to plan, fund and implement make needed improvements*

*The following types of technical assistance to DAC and EJ communities is necessary:*

- 1. Technical assistance to support participation including workshops designed for DAC and EJ communities describing the IRWM process and how it could benefit their communities.*
- 2. Technical assistance with project identification and development.*
- 3. Technical assistance with cost estimates, preliminary studies, and other activities to support projects submitted for inclusion in the IRWMP and implementation grants.*

*The Department of Health Services has developed a good program (through the Drinking*



*Water State Revolving Fund and Prop 50) to assist water systems that qualify as disadvantaged. Some of the tools they use include*

- 1. Hiring an outside consultant to assist these systems in improving their TMF capacity and assist them in developing grant applications.*
- 2. In Proposition 84, up to 25% of a grant award can be supplied upfront to fund planning, engineering and design costs – since most small systems lack the cashflow necessary to take advantage of the State's typical reimbursable grants*

*For dispersed disadvantaged communities, a representative NGO could be considered, who could advise on how to target benefits and address barriers to these communities. For instance, DACs have a lower response to rebate programs for low-flow toilets and washers because they don't have the ability to pay upfront for the appliances. So a standard conservation program tends to discriminate against these communities.*

*For concentrated DACs, more community-wide benefits can be reviewed, using a similar NGO representative model.*

Are there specific functions that DWR personnel can provide in the IRWM process that would help engage DACs?

DWR could work with local NGOs to give workshops on the IRWM to targeted DAC and EJ communities.

*DWR should consider providing assistance to DACs in developing their project and funding proposals.*

*DWR, with the assistance of state agencies working in the region, could assist the IRWM planners with identifying DAC and EJ communities and assessing their needs.*

In addition to technical assistance, is there also need for financial assistance and how do you envision those funds being used?

*DWR should use the unallocated portion of the IRWM funding in Proposition 84 to create either a pre-grant or bridge loan fund that would allow eligible communities to access funding for planning, design, environmental compliance and engineering costs.*

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*While direct stipends are needed to allow many DACs and NGOs to compete, I am reluctant to recommend a separate funding stream. The best plans to date have funded this participation themselves, and an IRWM planning effort should include a plan and funding mechanism for including all stakeholders. A key exception would be those areas, for instance in the Central Valley, where a large number of communities would qualify as disadvantaged or extremely disadvantaged.*

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**Disadvantaged Community Support Input**

Is addressing water quality and supply issues that directly impact DACs a priority in your region?

*NO*

Can the IRWM Process address direct water supply and quality problems in DACs? If so how? How was this addressed in your IRWM Plan

*The IRWM process can and should address direct water supply and quality issues in DAC and EJ communities. It is mandated in both Prop 50 and Prop 84. In addition, many of the water supply and quality issues in EJ and DAC, especially in those communities reliant on groundwater require a regional solution. That may come in the form of regional treatment plants, interties with surface water providers or exchanges of surface water used in irrigation for groundwater. Any and all of those approaches should be eligible for IRWM funding.*

*Most EJ and DAC community issues related to water supply and quality, such as fish contamination, public health issues related to storm water, etc. require regional solutions. Suggesting that these problems are beyond the scope of a Regional Plan is troubling and completely inconsistent with the wishes of California voters in their approval of both Prop 50 and Prop 84.*

*Most Regional plans did not address EJ and DAC issues. Two notable exceptions are the Plumas County Plan and the North Coast Plan.*

*The Bay Area in general has high-quality drinking water. However, lead from old pipes and fittings is still a hazard and would be most likely to be concentrated in substandard housing.*

*This was not addressed in the Bay Area IRWM*

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Are there other ideas or suggestions you have concerning engaging disadvantaged communities in the IRWM process? Are there items that DWR should emulate, retain or drop from other grant programs regarding DACs?

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**Regional Definition**

**Comment Summary from Previous Efforts –**

Provide a better definition of what a region is. Provide direction on appropriate regions.

**DWR Concept for IRWM Grant Program –**

Work with regional efforts upfront to establish functional regional/sub-regional efforts. The timing of Funding for implementation efforts will reflect the readiness of the various funding areas. DWR will work with regions to “pre-screen” regional efforts for readiness.

**Input Questions –**

Based on you experience with the existing IRWM Grant Program, how can the definition of a “region” be improved?

*It should be clear that agencies can not get together and create a “hop-sotch” outline of their region. Regions must include contiguous areas, especially when areas likely to be excluded are EJ and DAC communities.*

What factors other than water management objectives and hydrologic, watershed, and political boundaries should be considered in establishing IRWM Plan Region Boundaries?

For Prop 84 funding areas with multiple IRWM Planning Regions, identify possible mechanism for equitable distribution of limited funding.

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**Stakeholder Involvement**

For your region, please describe briefly who are the stakeholders and rate their level of involvement.

	STAKEHOLDER INTERESTS	HIGH	MED	LOW
	Water Districts			
	Sanitary Districts			
	Flood Control Districts			
	City Government			
	County Government			
	Municipalities			
	Associations of Government Agencies			
	Tribes			
	Watershed Groups			
	Environmental Groups			
	Community Based Groups			
	Environmental Justice Organizations			
	Representatives Disadvantaged Communities			
	Private Landowners			
	General Public			
	Universities			
	Industry/Trade Organizations			
	Other – List			

Please discuss if there are other stakeholders who should be involved in your regional efforts, but have not been.

Please discuss efforts that your region has made to ensure that IRWM Planning efforts are inclusive of diverse stakeholder interests.

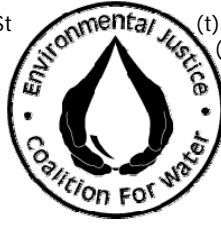
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OPTIONAL – Please provide brief information about the person(s) completing this form	
Region:	
Name	
Address	
If you are not already on the DWR IRWM Mailing/Distribution List, Please add the above listed person(s) to the IRWM distribution list. <input type="checkbox"/>	



# Environmental Justice Coalition for Water

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Disadvantaged and EJ Community

## Technical Assistance

### Minimum Standards for Technical Assistance Programs Improving Access to Infrastructure Bond Funds

- 1) Technical assistance should consist of the following:
  - a. Targeted outreach to disadvantaged (DAC) and Environmental Justice (EJ) Communities describing services available.
  - b. Targeted outreach to DAC and EJ communities to inform them of funding opportunities, timelines, and local planning processes related to grant programs.
  - c. Assistance in languages appropriate to a particular DAC or EJ community.
  - d. Stipends to fund community member participation in community planning processes.
  - e. Funds distributed directly to groups working in and with DAC and EJ communities to fund time spent in efforts to participate in planning processes and constructing grant and project applications.
- 2) Technical assistance should be provided by qualified individuals. For example engineering assistance should be provided by an engineer and preference should be given to individuals or organizations that have direct experience working in a particular community.
- 3) Technical assistance should be sub-contracted out, by the state, as necessary to ensure that those providing assistance are geographically accessible to DAC and EJ communities.
- 4) A variety of types of technical assistance should be available, not only to facilitate participation, but also to ensure that DAC and EJ communities have access to all necessary resources to develop grant and project proposals to access Bond Infrastructure funds.
- 5) Technical assistance funding and actual assistance should be made available well in advance of grant application deadlines and securing technical assistance for DAC and EJ communities should be an initial priority of any grant or planning process.
- 6) All agencies should collaborate to create a statewide technical assistance program providing access to expertise on all infrastructure bond funds regardless of which agency administers the funds and personnel should be encouraged to connect communities to every fund source for which they are eligible.
- 7) Technical assistance is not a substitution for program set-asides for DAC and EJ Communities.
- 8) Technical assistance programs should be evaluated annually to ensure that they are producing an actual increase in grant awards to DAC and EJ communities.